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Attorneys for Plaintiffs  
DEMETRIC DI-AZ and OWEN DIAZ

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

DEMETRIC DI-AZ, OWEN DIAZ, and  
LAMAR PATTERSON,

Plaintiffs,

v.

TESLA, INC. dba TESLA MOTORS, INC.;  
CITISTAFF SOLUTIONS, INC.; WEST  
VALLEY STAFFING GROUP;  
CHARTWELL STAFFING SERVICES, INC.;  
and DOES 1-50, inclusive,

Defendants.

Case No. 3:17-cv-06748-WHO

**DECLARATION OF NAVRUZ AVLONI  
IN SUPPORT OF PLAINTIFFS'  
MOTION FOR SANCTIONS**

Date: February 19, 2020

Time: 2:00 p.m.

Courtroom: 2, 17th Floor

Judge: Hon. William H. Orrick

Trial Date: May 11, 2020

Complaint filed: October 16, 2017

1 I, NAVRUZ AVLONI, hereby declare:

2 1. I am an attorney licensed to practice law in the State of California. I am an  
3 attorney with the law firm of California Civil Rights Law Group, attorneys of record for  
4 Plaintiffs Demetric Di-Az and Owen Diaz in this action. I submit this Declaration in support of  
5 Plaintiffs' Motion for Sanctions. I have personal knowledge of the facts stated herein and if  
6 called upon to testify, I could and would competently testify thereto, except as to those matters  
7 that are stated upon information and belief.  
8

9 2. On approximately June 7, 2019, I met and conferred in person with Reanne  
10 Swafford-Harris of Sheppard, Mullin, Richter & Hampton LLP, who is counsel of record for  
11 Defendant Tesla, Inc. dba Tesla Motors, Inc. in this matter. We met and conferred to discuss,  
12 among other issues, Tesla's responses to Plaintiffs' Interrogatories, Set 2.  
13

14 3. During our meeting, we discussed Plaintiffs' Interrogatories, Nos. 11 and 12,  
15 which asked Tesla to identify and provide the contact information of all employees and  
16 contractors who worked with or around Plaintiffs. Before our meeting, Tesla objected to these  
17 interrogatories and claimed it could not respond, because it could not ascertain the identities of  
18 employees who worked "with or around" Plaintiffs.  
19

20 4. In an attempt to compromise, I proposed a limitation to the interrogatories' scope.  
21 I suggested limiting the interrogatories to three groups of employees and contractors: (1)  
22 individuals who worked in the elevator department during Plaintiff Owen Diaz's work shifts; (2)  
23 individuals who worked in the recycling department during Plaintiff Owen Diaz's work shifts;  
24 and (3) individuals who worked on Plaintiff Demetric Di-az's "team", under the same  
25 supervisor.  
26  
27  
28

1           5.       Ms. Swafford-Harris did not propose a compromise and did not agree to my  
2 compromise. Instead, she stated that she did not know how big Plaintiff Di-az's team or the  
3 Recycling Department were, or who else Di-az's supervisor oversaw at the time.  
4

5           I declare under penalty of perjury under the laws of the United States of America that the  
6 foregoing is true and correct. Executed on January 10, 2020 in San Anselmo, California.  
7

8 DATED: January 10, 2020

By: \_\_\_\_\_



Lawrence A. Organ, Esq.

Navruz Avloni, Esq.

J. Bernard Alexander, Esq.

Cimone A. Nunley, Esq.

Attorneys for Plaintiffs

DEMETRIC DI-AZ AND OWEN DIAZ